

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO

In the Matter of the Search of)	
)	
U.S. Postal Service Priority Mail parcel bearing)	Magistrate Judge Deavers
tracking no. 9505 5138 1257 4268 4406 49.)	Case No. 2:24-mj-471
)	UNDER SEAL
)	
)	

I, Scott Emmick, Postal Inspector with The United States Postal Inspection Service, being duly sworn, depose and say:

INTRODUCTION

1. I make this affidavit in support of an application under Rule 41 of the Federal Rules of Criminal Procedure for a warrant to search the United States Postal Service Priority Mail parcel bearing tracking number 9505 5138 1257 4268 4406 49 (SUBJECT PARCEL), further described in Attachment A, for the things described in Attachment B. The SUBJECT PARCEL is currently located in the Southern District of Ohio, Eastern Division.

2. I am a United States Postal Inspector, having been so employed since July of 2023. I am presently assigned to the Columbus, Ohio Field Office, Pittsburgh Division of the United States Postal Inspection Service (USPIS). I have gained experience through completion of the Basic Inspector Training (BIT) in November of 2023. During BIT, I was instructed in all phases of criminal investigation, such as criminal law, search and seizure, field enforcement techniques, firearms proficiency, drug and narcotics identification, narcotics field testing, interviewing and evidence collection. Since November 2023 I have worked with various federal, state, and local law enforcement agencies in the investigation of crimes involving the U.S. Mail and the U.S. Postal

Service including but not limited to mail fraud, bank fraud, mail theft, burglaries, robberies, dangerous mail investigations, and mailed narcotics.

3. Prior to my employment with the USPIS, I was employed for five years by the Department of Homeland Security as a Border Patrol Agent in the Yuma, AZ sector of operations. As a Border Patrol Agent, I served as a federal law enforcement officer enforcing crimes such as human smuggling and narcotics smuggling. I performed several duties such as a line agent, checkpoint operations, highway interdiction, and was a part of the movement coordination cell. I gathered intelligence by conducting traffic stops, interviewing suspected citizens and non-citizens involving numerous federal offenses, and actively patrolling the United States and Mexico border.

4. Experience and drug trafficking intelligence have demonstrated that Priority Mail and Priority Mail Express are commonly used to transport drugs and drug proceeds because of their reliability and the time pressures they place on law enforcement agents to execute a successful controlled delivery.

5. The facts set forth in this affidavit are based on my personal knowledge, knowledge obtained during my participation in this investigation, knowledge obtained from other individuals, review of records related to this investigation, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. This affidavit is made in support of a warrant to search the SUBJECT PARCEL for evidence of a crime as well as contraband, fruits of a crime or other items illegally possessed, or property designed for use, intended for use, or used in committing a crime in relation to the following offenses:

- a. Possession with Intent to Distribute Controlled Substances, in violation of Title 21, United States Code, § 841,

- b. Use of a Communication Facility, in violation of Title 21, United States Code, § 843(b), and
- c. Conspiracy to Possess with Intent to Distribute Controlled Substances, in violation of Title 21, United States Code, § 846.

6. Because this affidavit is submitted for the limited purpose of establishing probable cause in support of the application for a search warrant, this affidavit does not set forth each and every fact learned by me during the course of this investigation.

SUBJECT PARCEL

7. On or about September 26, 2024, USPIS interdiction personnel in Columbus, Ohio interdicted the SUBJECT PARCEL; addressed to “Sherri Schmidt, 670 Smithers Dr., Reynoldsburg, OH 43068”; with a return address of “Cody Miller, 1886 Nantes PL#132, Chula Vista, CA 91913.” The SUBJECT PARCEL is further described as a white United States Postal Service Priority Mail Medium Flat Rate Box. The SUBJECT PARCEL weighs 1lbs 15.5ozs.

8. The SUBJECT PARCEL was mailed on September 24, 2024, from the Otay Mesa Post Office, located at 650 Dennery Rd. Ste. 102, San Diego, CA 92154, with \$18.40 of postage affixed to the parcel. The SUBJECT PARCEL is currently in the possession of the USPIS in Columbus, Ohio, in the Southern District of Ohio, Eastern Division.

PROBABLE CAUSE

9. Your Affiant has become aware through experience and training that drug traffickers frequently use Priority Mail services offered by the USPS to transport narcotics and other dangerous controlled substances as well as drug proceeds. These services charge a higher fee, because they are very timely, reliable and are trackable. However, due to the higher fee, these services are not typically used for personal mailings but rather are utilized by commercial

mailers and business customers. As they are mostly used for commercial services, they are typically paid for using electronic postage or credit card as opposed to being paid for in cash. Because these services are reliable and trackable, they are often favored by persons who transport contraband and/or illegal controlled substances and drug proceeds. When used for illegal activity, these services are frequently paid for in cash. In my experience and through my training I know drug traffickers often pay for these services in cash so that the transaction cannot be traced to a particular credit card or business account, and because drug trafficking is often a cash business. The SUBJECT PARCEL was paid for utilizing a cash transaction.

10. Among the characteristics of the drug profile possessed by the SUBJECT PARCEL is the “source state” origination of the parcel, as well as the destination of the SUBJECT PARCEL.

11. Your Affiant submits that the origin state of the SUBJECT PARCEL bears on the issue of probable cause here. US Postal Inspectors, Special Agents of the Drug Enforcement Administration (“DEA”), and other intelligence sources have identified California as a source state for illegal drugs flowing into Central Ohio and a destination state for the proceeds from the sale of these illegal drugs. Based on my training and experience, I know drug traffickers frequently utilize various shipping and mail entities, including the United States Postal Service, for the shipment of controlled substances. Frequently the same shipping entity utilized for the shipment of controlled substances is also utilized for the shipment of the proceeds derived from the sale of these controlled substances.

12. On or about September 26, 2024, your Affiant utilizing images of the SUBJECT PARCEL, obtained from USPS mail processing equipment, conducted checks of USPS, law enforcement, and open-source electronic databases were conducted to determine the validity of

the destination information contained on the SUBJECT PARCEL. The destination address, “670 Smithers Dr., Reynoldsburg, OH” was found to be a valid and deliverable address in the 43068- zip code. The name “Sherri Schmidt” was unable to be verified as associated to the address.

13. Further, on or about September 26, 2024, checks of USPS, law enforcement, and open-source electronic databases were conducted to determine the validity of the return information contained on the SUBJECT PARCEL. The return address, “1886 Nantes PL#132, Chula Vista, CA” was found to be a valid and deliverable address in the 91913- zip code. The name “Cody Miller” was unable to be verified as associated to the address.

14. Regarding both the above-described return and destination addresses, I know through training and experience, that shippers of drugs and drug proceeds will often utilize a fictitious return name or no name with a non-valid return address to reduce the possibility of identification and apprehension by law enforcement. Additionally, while a valid delivery address is necessary to ensure the delivery of a parcel, a fictitious delivery name or no name, is often utilized for the same reasons previously discussed.

15. Because the SUBJECT PARCEL originated in California, a state known as a source of controlled substances being mailed to Central Ohio, the return and destination names were unable to be as associated with the addresses given, the SUBJECT PARCEL was paid for in cash, and the SUBJECT PARCEL bore many similarities to other parcels believed to be associated and found to contain suspected controlled substances, investigators submitted the SUBJECT PARCEL for examination by a drug detecting canine.

EXAMINATION BY DRUG DETECTING CANINE

16. On or about September 26, 2024, US Postal Inspectors contacted Officer Brian Carter a part of the Columbus Division of Police K-9 Unit, who is the handler for “Odja,” a Drug

Detecting Canine. K-9 “Odja” has been certified by the Ohio Peace Officers Training Association since April 2024 for: drug detection; criminal apprehension, tracking, area and building searches, article searches, handler protection, and obedience. K-9 “Odja” has been trained and certified in the detection of cocaine, “crack”, heroin, methamphetamine, and their derivatives. K-9 “Odja” has had 200 hours of training at the *Gold Shield Training Kennels*, Pataskala, Ohio, a well-established and regarded training facility for police canines. Both in training and actual deployments, K-9 “Odja” has successfully detected narcotics, by demonstrating clear, positive, aggressive alerts (scratch), and has established himself as a highly reliable police service dog.

18. The SUBJECT PARCEL was hidden among other boxes and USPS mail processing equipment, and K-9 “Odja” was allowed to search the entire area. Officer Carter concluded that K-9 “Odja” did alert positively to the SUBJECT PARCEL. Based on that alert, Officer Carter concluded that the odor of one or more of the drugs K-9 “Odja” is trained and certified to detect was present.

19. Based upon training and experience, I respectfully submit that the above information is indicative of drug trafficking activity, and that, based on the above, there is probable cause to search the SUBJECT PARCEL.

20. If the SUBJECT PARCEL is found to contain controlled substances, these controlled substances will be seized as part of an ongoing drug trafficking investigation.

CONCLUSION

21. Based upon the foregoing facts and my training, experience, and expertise as a US Postal Inspector, I submit there is probable cause to search the SUBJECT PARCEL for controlled

substances, drug proceeds, and other evidence of violations of Title 21, United States Code, Sections 841(a)(1), 843(b), and 846.

22. WHEREFORE, I respectfully request that the Court issue a warrant, authorizing agents of the USPIS, including but not limited to other law enforcement agents and technicians assisting in the above-described investigation, to open, view, and photograph, and seize, if necessary, the SUBJECT PARCEL and its contents.

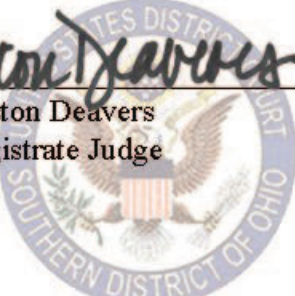
23. The above information is true and correct to the best of my knowledge, information, and belief.

Scott Emmick

Scott Emmick
US Postal Inspector

Sworn and subscribed to me this 27th day of September 2024

Elizabeth A. Preston Deavers
Elizabeth A. Preston Deavers
United States Magistrate Judge

The seal of the United States District Court for the Southern District of Ohio is visible in the background. It features an eagle with spread wings, perched on a shield with vertical stripes. The text "UNITED STATES DISTRICT COURT" is arched over the eagle, and "SOUTHERN DISTRICT OF OHIO" is arched below it.